

Rebecca Evans, #16846
LawHQ, LLC
299 S. Main St. #1300
Salt Lake City, UT 84111
Telephone: (385) 233-6612 ext. 3152
Email: rebecca@lawhq.com

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION
351 S. West Temple, Salt Lake City, UT 84101**

Thomas Alvord, an individual,

Plaintiff,

vs.

Quick Fi Capital Inc., a corporation;
Daniel Hardwick, individually and as CEO
of Hardwick Investors Group LLC dba
Quick Fi Capital; and **Texnicha
Outsourcing Solution**, a corporation,

Defendants.

MOTION TO COMPEL

Case No. 2:19-CV-00459

Senior Judge Dee Benson

Comes now the Plaintiff through his attorney, Rebecca Evans, and submits this Motion to Compel Discovery from Garnishee PayPal (“PayPal”) and requests an Order from this Honorable Court: (1) requiring PayPal to provide full and complete responses, without objection, to Plaintiff’s Writ of Garnishment which was previously served upon PayPal on or about December 31, 2019 and again served upon PayPal on or about DATE; and (2) requiring PayPal

to produce all of the information and documents responsive to the Writ of Garnishment; and in support thereof, Plaintiff states as follows:

1. On or about December 31, 2019, PayPal was served with the Writ of Garnishment. See Exhibit A.
2. On March 4, 2020, PayPal was faxed the Writ of Garnishment, sent and received at 12:42 A.M. MST to the number listed for PayPal's Legal Department. See Exhibit B.
3. The Writs propounded upon PayPal concern matters within PayPal's knowledge and control.
4. The deadline to respond to the Writs and return the information has passed and PayPal has still not made any attempt to respond or provide answers or materials relevant to the requests.

Plaintiff seeks an Order compelling PayPal's full and complete responses and delivery of the documents and information contained within the Writ.

WHEREFORE, Plaintiff respectfully requests the Court enter an Order: (1) requiring PayPal to provide full and complete responses, without objection, to Plaintiff's Writ within 10 days of the entry of this Order or be subject to further, more severe, sanctions; and (2) requiring PayPal to produce all of the documents responsive to the Writ within 10 days of the entry of this order or be subject to further, more severe, sanctions; and (3) granting Plaintiff such other and further relief as the Court deems just and proper.

Date: _____ th of March, 2020

Respectfully submitted,

/s/ Rebecca Evans

Rebecca Evans
Attorney for Plaintiff